

1 Sonal N. Mehta (SBN 222086)  
sonal.mehta@wilmerhale.com  
2 WILMER CUTLER PICKERING  
3 HALE AND DORR LLP  
2600 El Camino Real, Suite 400  
4 Palo Alto, CA 94306  
Telephone: (650) 858-6000  
5 Facsimile: (650) 858-6100

6 Joseph Taylor Gooch (SBN 294282)  
taylor.gooch@wilmerhale.com  
7 WILMER CUTLER PICKERING  
8 HALE AND DORR LLP  
50 California Street, Suite 3600  
9 San Francisco, CA 94111  
Telephone: (628) 235-1002  
10 Facsimile: (628) 235-1001

11 *Attorneys for Non-Party*  
12 *Netflix, Inc.*

13 **UNITED STATES DISTRICT COURT**  
14 **NORTHERN DISTRICT OF CALIFORNIA,**  
15 **SAN FRANCISCO DIVISION**

16 LYNWOOD INVESTMENTS CY LIMITED,  
Plaintiff,  
17 v.

18 MAXIM KONOVALOV, IGOR SYSOEV,  
19 ANDREY ALEXEEV, MAXIM DOUNIN, GLEB  
SMIRNOFF, ANGUS ROBERTSON, NGINX,  
20 INC. (BVI), NGINX SOFTWARE, INC., NGINX,  
INC. (DE), BV NGINX, LLC, RUNA CAPITAL,  
21 Inc., EVENTURE CAPITAL PARTNERS II, LLC  
and F5 NETWORKS, INC.,  
22 Defendants.

Case No. 3:20-cv-03778-MMC (KAW)

**JOINT STIPULATION EXTENDING  
TIME TO OPPOSE LYNWOOD'S  
MOTION TO COMPEL AND FOR  
LYNWOOD TO REPLY TO  
NETFLIX'S OPPOSITION  
PURSUANT TO CIVIL L.R. 6-1(b);  
AND ORDER**

Judge: Hon. Kandis A. Westmore Date:  
October 16, 2025  
Time: 1:30 P.M.

1 Pursuant to Civil Local Rule 6-1(b), Plaintiff Lynwood Investments CY Limited  
2 (“Lynwood”) and Non-Party Netflix, Inc. (“Netflix”) by and through their undersigned counsel,  
3 hereby agree and stipulate to the following:

4 WHEREAS, On June 10, 2025 Lynwood served a Subpoena for the Production of  
5 Documents (the “Subpoena”) on Netflix;

6 WHEREAS, On August 29, 2025 Lynwood filed a motion to compel Netflix to produce  
7 information pursuant to the Subpoena (ECF No. 228);

8 WHEREAS, Per Civil Local Rule 7-3(a), Netflix’s deadline to file an opposition to  
9 Lynwood’s motion to compel is September 12, 2025, and Per Civil Local Rule 7-3(c) Lynwood’s  
10 deadline to file a reply to Netflix’s opposition is September 19, 2025;

11 WHEREAS, On August 29, 2025 the Court referred Lynwood’s motion to a Magistrate  
12 Judge (ECF No. 231);

13 WHEREAS, on September 4, 2025 Lynwood’s motion to compel was assigned to the  
14 Honorable Kandis A. Westmore;

15 WHEREAS, on September 4 Judge Westmore set the hearing on Lynwood’s motion to  
16 compel for October 16, 2025 and ordered that the “briefing schedule remains in effect” (ECF No.  
17 232);

18 WHEREAS, counsel for Netflix is traveling internationally during the week of September  
19 8, and has multiple depositions and hearings scheduled during that time;

20 WHEREAS, counsel for Lynwood and counsel for Netflix have agreed to a mutual one-  
21 week extension of the briefing schedule for the opposition and reply to Lynwood’s motion to  
22 compel, such that Netflix’s opposition would be due September 19, 2025 and Lynwood’s reply  
23 would be due on September 26, 2025;

24 WHEREAS, this extension will not require the court to alter its scheduled October 16,  
25 2025 hearing date for Lynwood’s motion to compel, or any other deadline already fixed by Court  
26 order;

27 WHEREAS, this is the first extension sought by Lynwood and Netflix;  
28

1 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by and between  
2 the undersigned counsel for Lynwood and Netflix, that the deadline for Netflix's opposition to  
3 Lynwood's motion to compel is extended to September 19, 2025 and the deadline for Lynwood's  
4 reply to Netflix's opposition is extended to September 26, 2025.

5  
6  
7 Dated: September 10, 2025

Respectfully submitted,

8  
9 /s/ Taylor Gooch

10 Joseph Taylor Gooch (SBN 294282)  
11 taylor.gooch@wilmerhale.com  
12 WILMER CUTLER PICKERING  
13 HALE AND DORR LLP  
14 50 California Street, Suite 3600  
15 San Francisco, CA 94111  
16 Telephone: (628) 235-1002  
17 Facsimile: (628) 235-1001

18 Sonal N. Mehta (SBN 222086)  
19 sonal.mehta@wilmerhale.com  
20 WILMER CUTLER PICKERING  
21 HALE AND DORR LLP  
22 2600 El Camino Real, Suite 400  
23 Palo Alto, CA 94306  
24 Telephone: (650) 858-6000  
25 Facsimile: (650) 858-6100

26 *Attorneys for Non-Party*  
27 *Netflix, Inc.*

28  
Dated: September 10, 2025

/s/ Christopher J. Major

Alexander D. Pencu (*pro hac vice*)  
adp@msf-law.com  
Christopher J. Major (*pro hac vice*)  
cjm@msf-law.com  
Jeffrey P. Weigart (*pro hac vice*)


1 jpw@msf-law.com  
2 MEISTER SEELING & FEIN PLLC  
3 125 Park Avenue, 7<sup>th</sup> Floor  
4 New York, NY 10017  
5 Telephone: (212) 655-3500  
6 Facsimile: (646) 539-3649

7 Patricia L. Peden (SBN 206440)  
8 patricia@warrenkashwarren.com  
9 WARREN KASH WARREN LLP  
10 2261 Market Street, No. 606  
11 San Francisco, CA 94114  
12 Telephone: (415) 895-2940  
13 Facsimile: (415) 895-2964

14 *Attorneys for Plaintiff*  
15 *Lynwood Investments CY Limited*

16 **IT IS SO ORDERED.**

17 Dated: September 10, 2025

18   
19 Hon. Kandis A. Westmore  
20 United States Magistrate Judge  
21  
22  
23  
24  
25  
26  
27  
28